



Amy G. Rabinowitz  
*Counsel*

March 30, 2004

Mary L. Cottrell, Secretary  
Department of Telecommunications and Energy  
One South Station  
Boston, MA 02110

**Re: D.T.E. 03-124**

Dear Secretary Cottrell:

I am enclosing the response of Massachusetts Electric Company and Nantucket Electric Company ("Company") to the Department's Information Request DTE 3-3 and a motion for confidential treatment of the Company's response to DTE 3-1 and 3-2. I am providing Hearing Officer John Geary directly with the Company's confidential response to DTE 3-1 and 3-2.

Thank you very much for your time and attention to this matter.

Very truly yours,

  
Amy G. Rabinowitz

cc: Service List

25 Research Drive  
Westborough, MA 01582-0099  
Phone 508.389.2975  
Fax: 508.389.2463  
amy.rabinowitz@us.ngrid.com

	)	
Massachusetts Electric Company and	)	
Nantucket Electric Company Exogenous	)	D.T.E. 03-124
Factor Filing	)	
	)	

Pursuant to Mass. Gen. Laws c, 25, §5D and the Department’s procedural rules at 220 C.M.R. §1.04(5)(a) and (c), Massachusetts Electric Company and Nantucket Electric Company (collectively “Company”) hereby move for confidential treatment of the response to Department Information Requests DTE 3-1 and 3-2. This Second Supplemental Motion supplements the Motion of Massachusetts Electric Company and Nantucket Electric Company for Confidential Treatment filed February 18, 2004 in this docket (“Motion”) and the Supplemental Motion of Massachusetts Electric Company and Nantucket Electric Company for Confidential Treatment filed March 25, 2004 in this docket (“Supplemental Motion”). In the Motion, the Company set forth the applicable standard for granting protective status to confidential information. The Company incorporates that discussion into this Second Supplemental Motion.

In response to DTE 3-1, the Company identifies the underlying transaction associated with an invoice related to renewable portfolio standards (“RPS”) compliance and provides the

source document. Disclosing this response would enable market participants to glean information about how the Company is implementing and administering its RPS compliance plan. It will have adverse competitive effects on the Company's future efforts to ensure the most cost effective RPS compliance and will compromise the Company's ability to negotiate optimal contracts for RPS compliance, to the detriment of the Company's customers.

In response to DTE 3-2, the Company provides copies of three power supply contracts. Disclosing this response would enable potential future bidders to see the exact terms under which the Company is purchasing electric supply. This would have adverse competitive effects on future bids for both default and standard offer service and would compromise the Company's ability to negotiate optimal competitive contracts, to the detriment of the Company's customers. It would affect not only the Company, but also the other utilities in the state that will need to seek bids for electric supply.

For these reasons, the limited information and documents for which the Company is requesting confidential status meets the Department's requirements for protection.

**WHEREFORE**, for the reasons set forth herein, the Company respectfully requests that the Department grant the requested Second Supplemental Motion for Confidential Treatment, pursuant to G.L. c. 25, §5D and the Department's procedural rules at 220 C.M.R. §1.04(5)(a) and (c).

Respectfully submitted,  
MASSACHUSETTS ELECTRIC COMPANY  
NANTUCKET ELECTRIC COMPANY  
By their attorney,

---

Amy G. Rabinowitz  
25 Research Drive  
Westboro, MA 01582

Dated: March 30, 2004

CERTIFICATE OF SERVICE

I hereby certify that on March 30, 2004, I served a copy of the Second Supplemental Motion of Massachusetts Electric Company and Nantucket Electric Company for Confidential Treatment on the Service List in D.T.E. 03-124 by personal delivery or first class mail.

Signed under the pains and penalties of perjury

---

Amy G. Rabinowitz  
Attorney for Massachusetts Electric Company and  
Nantucket Electric Company

Dated: March 30, 2004

Massachusetts Electric Company  
Nantucket Electric Company  
Docket No. D.T.E. 03-124  
Responses to Department's Second Set of Information Requests

DTE 3-1

Request:

Refer to the Company's response to Information Request AG 1-1, Att. 1, invoice dated June 30, 2003. Please identify the associated transaction(s) and provide a copy of the source document(s).

Response:

The Company has requested confidential treatment of the response to this request. A confidential response to this request has been provided under separate cover.

Prepared by or under the supervision of: Michael J. Hager

Massachusetts Electric Company  
Nantucket Electric Company  
Docket No. D.T.E. 03-124  
Responses to Department's Second Set of Information Requests

DTE 3-2

Request:

Refer to the Company's response to Information Request AG 1-16. Please provide a copy of the following:

- (A) Contract ID 2003-10.
- (B) Contract ID 1998-08.
- (C) Contract ID 2002-13.

Response:

The Company has requested confidential treatment of the response to this request. A confidential response to this request has been provided under separate cover.

Prepared by or under the supervision of: Michael J. Hager

Massachusetts Electric Company  
Nantucket Electric Company  
Docket No. D.T.E. 03-124  
Responses to Department's Second Set of Information Requests

DTE 3-3

Request:

Refer to the Company's response to Information Request AG 1-16. Contract ID 1998-04 is associated with Seller "A." Also, refer to the Company's response to Information Request AG 1-5. The cover sheet immediately preceding Contract ID 1998-04 refers to Seller "A," yet the contract has been executed by "Seller "B". Please explain.

Response:

Contract ID 1998-04 was originally executed by Seller "B". Simultaneously with the execution of the contract by Seller "B", it was assigned to Seller "A". Thus, Seller "A" is the counterparty to the contract.

Prepared by or under the supervision of: Michael J. Hager